

Privacy Policy

Introduction

This privacy policy ("Policy") explains our policy regarding the collection, use, disclosure and transfer of information by ADITSH INSURANCE WEB AGGREGATOR PRIVATE LIMITED, (hereinafter, referred as the "Company"), CIN: U66000DL2021PTC379076, incorporated in India under the Companies Act, 2013, having its registered office at 251/3-5-9, S/F Gali No 6, Bhola Nath Nagar, Shahdra, Delhi, 110032, through the website www.adfpolicy.com.

The Company owns, develops, manages and operates the website hosted as www.adfpolicy.com ("Website"). This Privacy Policy is a part of the Terms and Conditions and is applicable to insurance solicitation through web aggregation model through the Website.

Please read this Privacy Policy along with the Terms and Conditions linked separately to this Website. All terms defined in the Terms and Conditions have the same meaning used here in this Privacy Policy. For the purpose of this Policy, wherever the context so requires "you" or "your" shall mean User and the term "we", "us", "our" shall mean the Company.

This Privacy Policy is published in compliance of:

1. Section 43A of the Information Technology Act, 2000; and
2. Regulation 4 of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011 (the "SPI Rules"). "Personal Information" and "Sensitive personal data or information" shall be as defined under the SPI Rules. The information about the Users as collected by Company is information:
 - (i) supplied by Users and
 - (ii) automatically tracked while navigation (Information).

This Privacy Policy statement shall apply to all Users who visit and/ or access the Company's Website. The Users unconditionally agree that that by accessing or registering on the Website and/or using the services of the Company, he / she signifies his / her unconditional assent to this Privacy Policy and to collection, storage, and use of the Personal Information you provide (including any changes thereto as provided by you) for any of the services that we offer.

We respect the privacy of the Users and are committed to protect it in all respects. Any dispute with the Company over privacy matters are subject to this Privacy Policy read in conjunction with the Terms and Conditions.

What data is collected?

Information Received, Collected and Sorted By the Company

Registration data:

Users may be required to provide certain personal information for the registration process that may include but not limited to:

1. Name
2. Email address,
3. Sex,
4. Age,
5. PIN code,
6. Credit card or debit card details,
7. Medical records and history,

8. Sexual orientation,
9. Biometric information,
10. Signatures
11. Income Details
12. Documents (like Address proof or Bank Statements)
13. Password etc., and / or your occupation, interests, and the like.

The Company presumes adequate and lawful parental consent in case the Personal Information is shared by a user under the age of 18 years.

When you register using your other accounts, we shall retrieve personal information from such account to continue to interact with you and to continue providing the Services.

Voluntary information:

We may collect additional information at other times, including but not limited to, when you provide feedback, comments, change your content or email preferences, respond to a survey, or any communication with us.

In order to serve you better, we may also collect/update your personal information from our Group Companies if the same information is not available/ updated in our records.

Any personally identifiable information provided by you will not be considered as sensitive if it is freely available and accessible in the public domain like any comments, messages, blogs, scribbles available on social platforms like Facebook, twitter etc. or is furnished under the Right to Information Act, 2005, any rules made there under or any other law for the time being in force. Any information posted/uploaded/conveyed/communicated by User on the public sections of the Website becomes published content and is not considered personally identifiable information subject to this Policy.

Cookies

We may use "cookies", or similar electronic tools to collect information to assign each User a unique, random number as a User Identification (User ID) to understand the User's individual interests using your computer/laptop/notebook or mobile/tablet/pad/handheld device etc. We will have no way of knowing who you are, even if we assign a cookie to your computer, unless you voluntarily identify yourself (through registration, for example). The only Personal Information a cookie can contain is information you supply. A cookie cannot read data off your hard drive. Our advertisers may also assign their own cookies to your browser (if you click on their ads), a process that we do not control. We receive and store certain types of information whenever you interact with us via Website, through your computer/laptop/netbook or mobile/tablet/pad/handheld device etc.

Log File Information

When you visit our Website, we automatically collect limited information about the connection of your computer/laptop/notebook or mobile/tablet/pad/handheld device etc to the Internet, mobile number, including your IP address, Your IP address is a number that lets computers attached to the Internet know where to send you data -- such as the pages you view. We automatically receive log information from your computer/laptop/notebook or mobile/tablet/pad/handheld device etc., including, but not limited to, your location, IP address, device name and its serial number or unique identification number, your device operating system, browser type and version, CPU speed and connection speed.

Demographic and purchase information

We may refer other sources of demographic and other information related to User behaviour in order to provide you with more targeted communications and promotions. We use Google Analytics among others, to track the User Behaviour and derive product related insight for our Website/App. Google Analytics specifically has been enabled to support display advertising towards helping us gain understanding of our Users'

Demographics and Interests. If you don't want Analytics to be used in your browser, you can install the Google Analytics Opt out browser add-on

Clear GIFs

We may use "clear GIFs" (Web Beacons) to track the online usage patterns of our Users in an anonymous manner, without personally identifying the User. We may also use clear GIFs in HTML-based emails sent to our Users to track which emails are opened by recipients. We use this information to inter-alia deliver our web pages to you upon request, to tailor our Site or Service to the interests of our Users, to measure traffic within our Website to improve the quality, functionality and interactivity of our Site and let advertisers know the geographic locations from where our Users come without personally identifying the Users.

Links to Third Party Sites / AD-Servers

The Website may include links to other websites or applications, which are governed by their respective privacy policies and are beyond the control of the Company. Once you leave our servers (you can check where you are by checking the URL in the location bar on your browser), use of any information you provide is governed by the privacy policy of the operator of the application, you are visiting. That policy may differ from ours. If you can't find the privacy policy of any such other website that you have visited, via a link on the website/ application's homepage, you should contact the owners of the application /website directly for more information.

We use third-party advertising companies to serve ads when you visit our Websites or applications. These companies may use information (not including your name, address, email address or telephone number or other personally identifiable information) about your visits to this and other Websites or application, in order to provide advertisements about goods and services of interest to you. We do not provide any Personally Information to third party websites/ advertisers/ ad-servers without your consent, except in the circumstance mentioned in below clause.

In case you decline to submit personally identifiable information on the Website, we may not be able to provide certain services on the Website to you and we will not be liable and/or be held responsible for the denial of certain services to you.

How collected data is used?

1. The information as supplied by the User enables us to improve the services (including advertising and personalization on the Website), provide you the most user-friendly experience and for developing new services.
2. We may use your email address for non-marketing or administrative purposes (such as notifying you of major changes, for customer service purposes, billing, etc.).
3. When you register with the Website, we contact you from time to time for the purpose of updating of your personal information to provide the User, such features that we believe may benefit / interest you.
4. If you interact with social media in connection with the Website, such as the Facebook Like button, or use your social media credentials to log-in or post content, these features may collect information about your use of the Website as well as post information about your activities on the social media service. Your interactions with social media companies are governed by their respective privacy policies.

How collected data is shared?

We take utmost care of our User's Personal Information and/or Sensitive Personal information and we share User's personal information with our officers, employees and third-parties service provider strictly on a "need to know" basis. Hence, we take all such steps to ensure that electronic records are valid under the Information Technology Act, 2000 as amended from time to time and notifications and rules framed thereunder.

The Company may share the User's Personal Information and/or Sensitive Personal Information to any third-party service provider/business partner without obtaining the prior consent of the User in the following limited circumstances:

1. When it is requested or required by law or by any court or governmental agency or authority to disclose, for the purpose of verification of identity, or for the prevention, detection, investigation of illegal activities including cyber incidents, or for prosecution and punishment of offences. These disclosures are made in good faith and belief that such disclosure is reasonably necessary for enforcing these Terms and Conditions; for complying with the applicable laws and regulations.
2. We may also share your information to investigate and address threats or potential threats to the physical safety of any person, to investigate and address violations of this Privacy Policy or the Terms and Conditions, or to investigate and address violations of the rights of third parties and/or to protect the rights, property and safety of the Company, our employees, Users or the public. This may involve the sharing of your information with law enforcement, government agencies, courts, and/or other organizations on account of legal request such as subpoena, court order or government demand to comply with the law.
3. We shall transfer information about the User in case the Company is acquired by or merged with another company.

Accessing, correcting, updating or deleting your personal information

When you use the Company's Website, we make good faith efforts to provide you, as and when requested, with access to your Personal Information so that any Personal Information or sensitive personal data or information found to be inaccurate or deficient shall be corrected or amended as feasible, subject to any requirement of retaining such Personal Information or sensitive personal data or information by law or for legitimate business purposes.

We encourage you to review, update and correct the personal information that we maintain about you, and you may request that we delete personal information about you that is inaccurate, incomplete or irrelevant for legitimate purposes, or are being processed in a way which infringes any applicable legal requirement. If you would like to review, change or delete personal information we have collected from you or permanently delete your account, please contact the Company's Grievance Officer.

We ask Users to identify themselves and the information requested to be accessed, corrected or removed before processing such requests. We may decline to process requests that are unreasonably repetitive, excessive, require disproportionate technical effort, jeopardize the privacy of others, appears to be suspicious of the request being received from person other the User or would be extremely impractical (for instance, requests concerning information residing on backup tapes), or if the information / material you request relates to existing or anticipated legal proceedings between you and us or providing access to you would prejudice negotiations between us or an investigation of possible unlawful activity. In any case, where we provide information access and correction, we perform this service free of charge, except if doing so would require a disproportionate effort. After you delete your information, residual copies may take a period of time before they are deleted from our active servers. However, the information may remain in our backup systems for a longer period.

Your right to review, update, correct and delete your information is subject to our records retention policies and applicable law, including any statutory retention requirements.

Retention of Data

We shall retain the records as may be required under the applicable Law from time to time. In the event any legal / regulatory proceeding is pending, we can retain records for a longer period as may be required by regulatory / statutory authorities.

We may keep our records of the electronic instructions/transactions in any form as permitted under applicable Laws. In this regard, all records, whether in electronic form, magnetic form, documents or any other form with respect to electronic instructions/online transactions shall be conclusive evidence of such instructions/transactions and shall be binding on the User. The User shall not request/demand any evidence or

proof for the transactions undertaken through the internet and the audit trail of the log-in would be conclusive proof to establish the bona fides of the transactions. In the event of any dispute, records kept by us/ business partners/ third party shall be binding as conclusive evidence of the transactions carried out through the electronic mode.

How we protect your personal information?

We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. These include internal reviews of our data collection, storage and processing practices and security measures, including appropriate encryption and physical security measures to guard against unauthorized access to systems where we store personal data.

All information gathered on the Website is securely stored within controlled database. The database is stored on servers secured behind a firewall; access to the servers is password-protected and is strictly limited. However, as effective as our security measures are, no security system is impenetrable. We can neither guarantee the security of our database, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the internet. And, of course, any information you include in a posting to the discussion areas is available to anyone with internet access. We assume no liability or responsibility for disclosure of your information due to errors in transmission, unauthorized third-party access, or other causes beyond our control. You play an important role in keeping your personal information secure.

Changes to privacy notice

The internet is an ever-evolving medium. We may change our Privacy Policy from time to time to incorporate necessary changes. Of course, the use of any information gathered by us will always be consistent with the version of the policy under which the information was collected, regardless of what the new policy may be. We encourage the Users to keep themselves abreast of the Privacy Policy periodically. Any complaints or concerns with regards to content or to report any abuse of laws or breach of these terms may be taken up with the designated grievance officer as mentioned below via post or by sending an email to pawan@aditsh.com to Mr. Pawan Kapoor ("Grievance Officer").

Grievance Redressal

Redressal Mechanism: Any complaints, abuse or concerns with regards to content and or comment or breach of these terms shall be immediately informed to the designated Grievance Officer as mentioned below via in writing or through email signed with the electronic signature to.

Mr. Pawan Kapoor (Grievance Officer)
Aditsh Insurance Web Aggregator Private Limited.
pawan@aditsh.com

251/3-5-9, S/F Gali No 6, Bhola Nath Nagar, Shahdra, Delhi, 110032

We request you to please provide the following information in your complaint: -

1. Identification of the information provided by User.
2. Clear statement as to whether the information is Personal Information or Sensitive Personal Information.
3. User address, telephone number or e-mail address.
4. A statement that User has a good-faith belief that the information has been processed incorrectly or disclosed without authorization, as the case may be.
5. A statement, under penalty of perjury, that the information in the notice is accurate, and that the information being complained about belongs to the User.

The Company may reach out to you to confirm or discuss certain details about your complaint and issues raised therein.

The Company shall not be responsible for any communication, if addressed, to any non-designated person in this regard